

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CYNTHIA RUSSO, LISA BULLARD,  
RICARDO GONZALES, INTERNATIONAL  
BROTHERHOOD OF ELECTRICAL  
WORKERS LOCAL 38 HEALTH AND  
WELFARE FUND, INTERNATIONAL  
UNION OF OPERATING ENGINEERS  
LOCAL 295-295C WELFARE FUND, AND  
STEAMFITTERS FUND LOCAL 439, on  
Behalf of Themselves and All Others Similarly  
Situated,

Plaintiffs,

v.

WALGREEN CO.,

Defendant.

Civil No. 17-cv-2246

Judge Edmond E. Chang

**JOINT STATUS REPORT**

Pursuant to the Court's September 19, 2024 Order (ECF No. 676), the parties, through their respective counsel, respectfully submit the following Joint Status Report to update the Court on the status of the parties' settlement.

**I. The Status of Settlement Discussions**

The parties have reached a settlement of the action and finalized the settlement agreement and related ancillary documents. On Friday, November 1, 2024, Plaintiffs filed their unopposed motion for preliminary approval of the settlement. The parties are making the necessary preparations for notification to go out upon the Court's preliminary approval, and have engaged a settlement administrator and are working on proposed next steps included in the documents filed by Plaintiffs.

**II. Whether the Parties Believe a Telephonic Hearing or In-Person Hearing Is Necessary Within the Next 60 Days**

Consistent with the September 19, 2020 Order, the parties understand that the Court will review the motion for preliminary approval of the settlement and set a hearing date on the motion.

DATED: November 4, 2024

s/ Michael Scott Leib

Michael Scott Leib

Anthony Robert Todd

**REED SMITH LLP**

10 S Wacker Dr # 4000

Chicago, IL 60606

Telephone: 312-207-1000

*mleib@reedsmith.com*

*atodd@reedsmith.com*

Selina Coleman (*pro hac vice*)

Jessica Christensen (*pro hac vice*)

**REED SMITH LLP**

1301 K Street, N.W. Suite 1100

East Tower

Washington, DC 20005

Telephone: 202-414-9200

*scoleman@reedsmith.com*

*jchristensen@reedsmith.com*

***Attorneys for Defendant Walgreen Co.***

s/ Joseph P. Guglielmo (with permission)

Joseph P. Guglielmo (IL Bar #2759819)

Amanda Rolon (*pro hac vice*)

**SCOTT+SCOTT ATTORNEYS AT LAW  
LLP**

The Helmsley Building

230 Park Avenue, 24<sup>th</sup> Floor

New York, NY 10169

Telephone: 212-223-4478

*jguglielmo@scott-scott.com*

*arolon@scott-scott.com*

Erin Green Comite (IL Bar #420630)

**SCOTT+SCOTT ATTORNEYS AT LAW  
LLP**

156 S. Main Street

P.O. Box 192

Colchester, CT 06415

Telephone: 860-531-2632

Facsimile: 860-537-4432

*ecomite@scott-scott.com*

David W. Mitchell (IL Bar # 199706)

Arthur L. Shingler III (IL Bar # 181719)

**ROBBINS GELLER RUDMAN  
& DOWD LLP**

655 West Broadway, Suite 1900

San Diego, CA 92101

Telephone: 619-231-1058

*davidm@rgrdlaw.com*

*ashingler@rgrdlaw.com*

Mark J. Dearman (IL Bar #0982407)

Stuart A. Davidson (IL Bar #084824)

**ROBBINS GELLER RUDMAN  
& DOWD LLP**

120 East Palmetto Park Road, Suite 500  
Boca Raton, FL 33432  
Telephone: 561-750-3000  
*sdavidson@rgrdlaw.com*  
*mdearman@rgrdlaw.com*

***Interim Co-Lead Counsel***

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was filed electronically through the Court's Electronic Case Filing System, which will then send a notification of such filing to the registered participants as identified on the Notice of Electronic Filing.

s/ Michael Scott Leib  
Michael Scott Leib